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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NICOLE BLOCK,)	Case No.: 4:16-cv-02381-KAW
)	
Plaintiff,)	
)	
vs.)	JOINT STUPULATION AND
NANCY A. BERRYHILL,)	PROPOSED ORDER FOR EXTENSION
Acting Commissioner of Social Security,)	OF TIME
)	
Defendant.)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Opposition to Plaintiff’s Opening Brief, originally due on June 6, 2017, by 14 days, through and including Tuesday, June 20, 2017. This is the Commissioner’s second request for an extension of time in this matter.

An extension of time is needed due to the exceptionally complex nature of the administrative decision in this case, which involved a combination of medically-equaling multiple disability listings, a finding of drug and alcohol abuse (DAA) precluding an earlier finding of disability, and a partial award of benefits. This exceptional combination of multiple

1 listings, a DAA finding, and a partial award of benefits, necessitates additional review and
2 analysis by the agency and the undersigned, resulting in the request for a second brief extension
3 of time. This request is made in good faith with no intention to unduly delay the proceedings.
4 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request, on June
5 2, 2017.

6 Respectfully submitted this 5th day of June, 2017.

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8 BRIAN STRETCH
9 United States Attorney
10 DEBORAH STACHEL
Regional Chief Counsel, Region IX

11 By /s/ Adam Lazar
12 ADAM LAZAR
13 Special Assistant U.S. Attorney
14 Attorneys for Defendant
15

16 **ORDER**

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18 IT IS SO ORDERED.

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20 Date: 6/6/17

21 By: Kandis Westmore
22 THE HON. KANDIS A. WESTMORE
23 UNITED STATES MAGISTRATE JUDGE
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